

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: JOHNSON & JOHNSON
TALCUM POWDER PRODUCTS
MARKETING, SALES
PRACTICES, AND PRODUCTS
LIABILITY LITIGATION**

MDL NO. 16-2738 (MAS) (RLS)

THIS DOCUMENT RELATES TO ALL CASES

CERTIFICATION OF P. LEIGH O'DELL, ESQ.

P. Leigh O'Dell, ESQ., hereby certifies as follows:

1. I am an attorney at law and member of the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I was appointed as Plaintiffs' Co-Lead Counsel to represent all Plaintiffs. I submit this Certification based on personal knowledge in support of Plaintiffs' Steering Committee's Opposition to Defendants' Motion to Exclude the Opinions of Dr. John Godleski.

2. Attached hereto as Exhibit 1 is a true and correct copy of Echeverria trial transcript, JCCP No. 4872 dated August 3, 2017.

3. Attached hereto as Exhibit 2 is a true and correct copy of McDonald SA, et al., "*Magnesium/silicon atomic weight percent ratio standards for the tissue identification of talc by scanning electron microscopy and energy dispersive X-ray analysis*," *Ultrastructural Pathology* (2019);43(1):13-27.

4. Attached hereto as Exhibit 3 is a true and correct copy of Campion A et al.. *“Identification of Foreign Particles in Human Tissues Using Raman Microscopy,”* Analytical Chemistry (2018) 90:(14), 8362- 8369.

5. Attached hereto as Exhibit 4 is a true and correct copy of McDonald SA, et al., *“Magnesium/silicon atomic weight percent ratio standards for the tissue identification of talc by scanning electron microscopy and energy dispersive X-ray analysis.”* Ultrastructural Pathology (2019); 43(6):248-260.

6. Attached hereto as Exhibit 5 is a true and correct copy of the Curriculum Vitae of John J. Godleski dated November 14, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of the Expert Report of John J. Godleski, M.D. (Gallardo) dated July 21, 2021.

8. Attached hereto as Exhibit 7 is a true and correct copy of the Expert Report of John J. Godleski, M.D. (Converse) dated July 12, 2021.

9. Attached hereto as Exhibit 8 is a true and correct copy of the Expert Report of John J. Godleski, M.D. (Rausa) dated July 21, 2021.

10. Attached hereto as Exhibit 9 is a true and correct copy of the Expert Report of John J. Godleski, M.D. (Judkins) dated June 18, 2021.

11. Attached hereto as Exhibit 10 is a true and correct copy of the Expert Report of John J. Godleski, M.D. (Newsome) dated June 24, 2021.

12. Attached hereto as Exhibit 11 is a true and correct copy of the deposition transcript of John J. Godleski, M.D. (MDL) dated March 28, 2024.

13. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

/s/ P. Leigh O'Dell

P. LEIGH O'DELL

Dated: August 22, 2024